

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BO SHEN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

EXELA TECHNOLOGIES, INC.,
RONALD COGBURN, and JAMES G.
REYNOLDS,

Defendants.

Case No. 3:20-cv-00691-D

**RESPONSE TO ORDER TO SHOW CAUSE REGARDING SERVICE AS TO
DEFENDANTS RONALD COGBURN AND JAMES G. REYNOLDS**

Lead Plaintiff Insur Shamgunov and Elena Shamgunova respectfully submit this response to the Court's Order to demonstrate good cause for failing to effect service on defendants Ronald Cogburn and James G. Reynolds. *See* Dkt. No. 14. On June 11, 2020, defendant Exela Technologies Inc. was served with the summons and complaint. *See* Dkt. No. 12. On June 12, 2020, the Court appointed Insur Shamgunov and Elena Shamgunova as Lead Plaintiff and approved their selection of Glancy Prongay Murray LLP as Lead Counsel and Kendall Law Group, PLLC as Local Counsel for the Class. *See* Dkt. No. 11. Counsel for the remaining defendants agreed to accept service.

On June 19, 2020, counsel for Defendants contacted Lead Counsel to confer regarding a proposed schedule for the filing of an amended complaint and a briefing schedule for Defendants' anticipated motion to dismiss. On June 30, 2020, Defendants filed an unopposed motion requesting the Court's approval of the proposed schedule, in which they stated that "upon filing the instant

Motion, Defendants shall be deemed to have accepted service in this matter, without waiver of any Rule 12 arguments other than objections to sufficiency of service.” *See* Dkt. No. 15 at 2.

Thus, Lead Plaintiff submits that all defendants have been served in the above-captioned matter.

Dated: July 16, 2020

Respectfully submitted,

/s/ Joe Kendall

JOE KENDALL

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*Counsel for Lead Plaintiff Insur Shamgunov and
Elena Shamgunova and Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on this day, July 16, 2020, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Joe Kendall

JOE KENDALL